

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Implementation of the Local Competition) CC Docket No. 96-98
Provisions in the Telecommunications Act)
of 1996)
)
)
Interconnection between Local Exchange) CC Docket No. 95-185
Carriers and Commercial Mobile Radio)
Service Providers)

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COMMENTS IN SUPPORT OF THE
MOTION FOR EXTENSION OF PAGE LIMIT

By these comments, GTE Service Corporation ("GTE") respectfully requests that the Commission grant the Motion for Extension of Page Limit filed by the United States Telephone Association ("USTA") in the above-captioned proceeding.¹ GTE supports USTA's request to extend the page limit for oppositions to petitions for reconsideration and/or clarification given the complex issues raised in the *Interconnection Order* and the fact that petitioners were granted a waiver to file petitions of up to 50 pages.² Also, GTE agrees that the Commission should clarify that empirical economic studies and copies of relevant state orders will not be counted

¹ United States Telephone Association, Motion for Extension of Page Limit, CC Docket No. 96-98 (filed Oct. 18, 1996).

² See *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996* (CC Docket No. 96-98), FCC 96-325 (Aug. 8, 1996) (*First Report and Order*) [hereinafter *Interconnection Order*].

against the page limit, as was the case for comments filed in response to the original *Notice of Proposed Rulemaking*.³

As an initial matter, GTE supports USTA's motion in light of the significant number of complex issues decided in the *Interconnection Order* and raised in the petitions for reconsideration and/or clarification. There is little doubt that the Commission's rules implementing Sections 251 and 252 of the Communications Act will have a broad-reaching impact on consumers and the telecommunications industry. As USTA correctly points out, approximately 40 parties filed petitions in this proceeding, and the petitions take issue with, or seek clarification of, almost every major conclusion in the Commission's *Order*. Therefore, GTE maintains that an increased page limit is warranted in order to give parties who wish to respond to these petitions an adequate opportunity to do so and provide relevant information to the Commission.

Furthermore, GTE believes that it would be grossly inequitable to deny USTA's motion given that a nearly identical page extension request for petitions for reconsideration in this proceeding was recently granted.⁴ In authorizing that extension, the Common Carrier Bureau correctly reasoned that the breadth and complexity of the issues raised in the *Interconnection*

³ See *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996* (CC Docket No. 96-98), FCC 96-182 (April 19, 1996) (*Notice of Proposed Rulemaking*) at ¶ 291.

⁴ See *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996* (CC Docket No. 96-98) and *Interconnection Between Local Exchange Carriers and Commercial Mobile Radio Service Providers* (CC Docket No. 95-185), DA 96-1603 (Sept. 24, 1996).

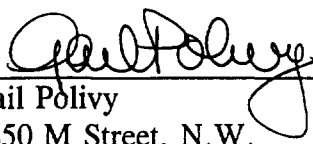
Order will require parties to provide more discussion than is typically required. Accordingly, the Commission should grant USTA's request because these same considerations apply to the oppositions and given the fact that such an extension has already been granted to the petitioners.

In addition, as was done regarding the comments originally filed in this proceeding, the Commission should clarify that empirical economic studies and copies of relevant state orders will not be counted against the page limit. GTE submits that econometric studies and state materials are directly relevant to the issues raised on reconsideration. Parties may not effectively respond to the petitioners' assertions if these materials are included within the page limit for oppositions in this proceeding.

Accordingly, GTE submits that good cause has been shown to grant USTA's motion.

Respectfully submitted,

GTE SERVICE CORPORATION


Gail Polivy
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20004
(202) 463-5214

Their Attorney

October 21, 1996

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of October, 1996, I caused copies of the foregoing "Comments In Support of the Motion For Extension of Page Limit" to be mailed via first-class postage prepaid mail to the following:

Carl W. Northrop
Christine M. Crowe
Paul, Hastings, Janofsky
and Walker LLP
1299 Pennsylvania Ave., N.W.
Tenth Floor
Washington, D.C. 20004-2400

Counsel for Airtouch Paging,
et al.

Shirley S. Fujimoto
Christine M. Gill
Kris Anne Monteith
McDermott, Will & Emery
1850 K Street, N.W., Suite 500
Washington, D.C. 20006

Counsel for American Electric Power
Service Corporation, et al.

James Baller
Lana Meller
The Baller Law Group
1820 Jefferson Place, N.W.
Suite 200
Washington, D.C. 20036

Counsel for American Public Power
Association

Paul H. Kuzia
Vice President, Engineering
and Regulatory Affairs
Arch Communications Group, Inc.
1800 West Park Drive, Suite 350
Westborough, MA 01581

Richard J. Metzger
Emily M. Williams
Association for Local
Telecommunications Services
1200 19th Street, N.W.
Suite 560
Washington, D.C. 20036

Thomas J. Keller
Kathy D. Smith
Verner, Liipfert, Bernhard,
McPherson & Hand, Chtd.
901 15th Street, N.W.
Suite 700
Washington, D.C. 20005

Counsel for the Association of
American Railroads

David W. Carpenter
David Lawson
Sidley & Austin
One First National Plaza
Chicago, IL 60603

Counsel for AT&T Corp.

Mark C. Rosenblum
Roy E. Hoffinger
Stephen C. Garavito
Richard H. Rubin
AT&T Corp.
295 N. Maple Avenue
Basking Ridge, NJ 07920

Russell D. Lukas
Lukas, McGowan, Nace &
Gutierrez, Chartered
1111 19th Street, N.W.
Suite 1200
Washington, D.C. 20036

Counsel for Beehive
Telephone Company, Inc.

Michael F. Altschul
Randall S. Coleman
Cellular Telecommunications
Industry Association
1250 Connecticut Ave., N.W.
Suite 200
Washington, D.C. 20036

Raymond G. Bender
J.G. Harrington
Peter A. Batacan
Dow, Lohnes & Albertson
1200 New Hampshire Ave., N.W.
Suite 800
Washington, D.C. 20036

Counsel for Vanguard
Cellular Systems, Inc.

Leonard J. Kennedy
Laura H. Phillips
Peter A. Batacan
Dow, Lohnes & Albertson
1200 New Hampshire Ave., N.W.
Suite 800
Washington, D.C. 20036

Counsel for Comcast Cellular
Communications, Inc.

Ellyn Crutcher
Consolidated Communications
Telecom Services Inc.
121 South 17th Street
Mattoon, IL 61938

John D. McMahon
Mary L. Krayske
Consolidated Edison Company
of New York, Inc.
4 Irving Place - Room 1815-S
New York, NY 10003

Werner K. Hartenberger
Laura H. Phillips
J.G. Harrington
Dow, Lohnes & Albertson
1200 New Hampshire Ave., N.W.
Suite 800
Washington, D.C. 20036

Counsel for Cox Communications, Inc.

Dale G. Stoodley
Joanne M. Scanlon
Delmarva Power & Light Company
800 King Street
P.O. Box 231
Wilmington, DE 19899

John H. O'Neill, Jr.
Norman J. Fry
Shaw, Pittman, Potts & Trowbridge
2300 N Street, N.W.
Washington, D.C. 20037-1128

Counsel for Duquesne Light Company

Steven J. Del Cotto
Duquesne Light Company
411 Seventh Avenue, 16-006
P.O. Box 1930
Pittsburgh, PA 15239-1930

David L. Swanson
Edison Electric Institute
701 Pennsylvania Ave., N.W.
Washington, D.C. 20004

Jeffrey L. Sheldon
Sean A. Stokes
UTC, et al.
1140 Connecticut Ave., N.W.
Suite 1140
Washington, D.C. 20036

Shirley S. Fujimoto
Christine M. Gill
Thomas J. Navin
McDermott, Will & Emery
1850 K Street, N.W.
Suite 500
Washington, D.C. 20006

Counsel for Florida Power &
Light Company

Jonathan Jacob Nadler
Brian J. McHugh
Squire, Sanders & Dempsey
1201 Pennsylvania Ave., N.W.
P.O. Box 407
Washington, D.C. 20044

Counsel for Information
Technology Association of
America

Ralph Miller
General Manager
Kalida Telephone Company, Inc.
121 E. Main Street, Box 267
Kalida, OH 45853

William F. Maher, Jr.
David Colton
Halprin, Temple, Goodman & Sugrue
1100 New York Ave., N.W.
Suite 650 East
Washington, D.C. 20005

Counsel for The Local Exchange
Carrier Coalition

Thomas J. Keller
Kathy D. Smith
Verner, Liipfert, Bernhard,
McPherson & Hand, Chtd.
901 15th Street, N.W.
Suite 700
Washington, D.C. 20005

Counsel for the Lower Colorado
River Authority

Russell D. Lukas
David L. Nace
Lukas, McGowan, Nace & Gutierrez
1111 19th Street, N.W.
Suite 1200
Washington, D.C. 20036

Counsel for Margaretville
Telephone Co., Inc.

Anthony C. Epstein
Donald B. Verrilli, Jr.
Jodie L. Kelley
Jenner and Block
601 13th Street, N.W.
Washington, D.C. 20005

Counsel for MCI Telecommunications
Corporation

Lisa B. Smith, et al.
MCI Telecommunications Corporation
1801 Pennsylvania Ave., N.W.
Washington, D.C. 20006

Andrew D. Lipman
Russell M. Blau
Swidler & Berlin
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007

Counsel for MFS Communications
Company, Inc.

David N. Porter
Vice President, Government Affairs
MFS Communications Company, Inc.
3000 K Street, N.W., Suite 300
Washington, D.C. 20007

Howard J. Symons
Christopher J. Harvie
Mintz, Levin, Cohn, Ferris,
Glovsky and Popeo, P.C.
701 Pennsylvania Ave., N.W.
Suite 900
Washington, D.C. 20004

Counsel for National Cable
Television Association, Inc.

Daniel L. Brenner
Neal M. Goldberg
David L. Nicoll
The National Cable Television
Association, Inc.
1724 Massachusetts Ave., N.W.
Washington, D.C. 20036

Perry S. Goldschein
Joanne Salvatore Bochis
National Exchange Carrier
Association, Inc.
2300 N Street, N.W.
Suite 600
Washington, D.C. 20037

Linda L. Agerter
Shirley A. Woo
Pacific Gas and Electric Company
Law Department, B30A
P.O. Box 7442
San Francisco, CA 94120

Judith St. Ledger-Roty
Reed Smith, Shaw & McClay
1301 K Street, N.W.
Suite 1100 - East Tower
Washington, D.C. 20005-3317

Counsel for Paging Network, Inc.

Walter Steimel, Jr.
Marjorie K. Conner
Hunton & Williams
1900 K Street, N.W.
Washington, D.C. 20006

Counsel for Pilgrim Telephone, Inc.

Michael S. Varda
Telecommunications Division
Public Service Commission of Wisconsin
P.O. Box 7854
Madison, WI 53707-7854

Anthony Marquez
First Assistant Attorney General
State of Colorado
1580 Logan Street, OL2
Denver, CO 80203

Pat Wood, III
Robert W. Gee
Judy Walsh
Public Utility Commission of Texas
7800 Shoal Creek Boulevard
Austin, TX 78757

Leon M. Kentenbaum
Jay C. Keithley
Richard Juhnke
Sprint Corporation
1850 M Street, N.W.
Washington, D.C. 20036

Teresa Marrero
Teleport Communications Group, Inc.
Two Teleport Drive
Staten Island, NY 10311

Mitchell F. Brecher
Fleischman and Walsh, L.L.P.
1400 Sixteenth Street, N.W.
Washington, D.C. 20036

Counsel for Time Warner
Communications Holdings, Inc.

Jeffrey L. Sheldon
Sean A. Stokes
UTC
1140 Connecticut Ave., N.W.
Suite 1140
Washington, D.C. 20036

Dana Frix
Antony R. Petrilla
Swidler & Berlin, Chtd.
3000 K Street, N.W.
Suite 3000
Washington, D.C. 20007

Counsel for WinStar Communications, Inc.

Timothy R. Graham
Robert G. Berger
Joseph Sandri
WinStar Communications, Inc.
1146 19th Street, N.W.
Washington, D.C. 20036

Robert J. Aamoth
Reed, Smith, Shaw & McClay
1301 K Street, N.W.
Suite 1100 - East Tower
Washington, D.C. 20005

Counsel for WorldCom, Inc.

Catherine R. Sloan
Richard L. Fruchterman
Richard S. Whitt
WorldCom, Inc.
1120 Connecticut Ave., N.W.
Suite 400
Washington, D.C. 20036

Carrie P. Meek
Congress of the United States
17th District
25 West Flagler Street
Suite 1015
Miami, FL 33130

Dave Weldon
Congress of the United States
15th District
Brevard County Government Complex
2725 St. John Street - Bldg. C
P.O. Box 410007
Melbourne, FL 32941

Jesse A. Dillon
Pennsylvania Power & Light Company
Two North Ninth Street
Allentown, PA 18101-1179

Jodi J. Bair
Assistant Attorney General
Public Utilities Section
180 East Broad Street
Columbus, OH 43215-3793

Kathy L. Shobert
Director, Federal Affairs
General Communications, Inc.
901 15th Street, N.W.
Suite 900
Washington, D.C. 20005

Richard E. Jones
Walter Steimel, Jr.
Carolina Power & Light Company
1900 K Street, N.W.
Washington, D.C. 20006

Daniel S. Goldberg
Goldberg, Godles, Wiener & Wright
1229 Nineteenth Street, N.W.
Washington, D.C.

Counsel for Rand McNally & Company

Steven W. Smith
Assistant Attorney General
Utilities and Transportation Division
1400 S. Evergreen Park Drive, SW
P.O. Box 40128
Olympia, WA 98504-0128

A handwritten signature in black ink, appearing to read "Andrew Butts", is written over a horizontal line.